



Koppers Performance Chemicals

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September 8, 2022

US Environmental Protection Agency
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
1200 Pennsylvania Ave. NW
Washington, DC 20460

Re: InPro DCOI Wood Preservative, EPA Reg. No. 3008-133
Label amendment to update retention level range and other minor changes

Enclosed is an application to amend the **InPro DCOI Wood Preservative (EPA Reg. No. 3008-134)** label. Below is a summary of the requested changes.

1. Increase the target retention rate range from "0.1 to 0.24" to "0.1 to 0.35."
 - a. Certain wood species require a retention rate higher than 0.24 pounds per cubic foot (pcf).
 - b. Another DCOIT-containing wood preservative has a range of "0.1 to 0.35." The product is UP-23-G3, EPA Reg. No. 83997-15.
2. Add "Wood Preservative" to the heading under the product name. It now reads, "ANTIMICROBIAL – WOOD PRESERVATIVE" to be consistent with our other labels.
3. Add heavy PVC and butyl-viton as other options of PPE materials.
4. Remove "mold and mildew." These were left over from a prior version of the label that had above ground uses. The above ground uses were removed with the last label amendment approved on June 24, 2022.
5. Update the types of products that may be mixed with InPro DCOI Wood Preservative in Step 1 of the Directions for Use, namely de-emulsifier.
6. Update the values in Table 1 because a resin or wax may not be used.
7. Under Container Handling section of Storage and Disposal, we added "or solvent" in the triple rinse instructions. This product is diluted in solvents for treating the wood. Using water would unnecessarily increase the amount of waste water. If a solvent is used, the rinsate can be emptied into the application equipment or mix tank as described in the Container Handling section.

Please find the following documents to support this application:

1. Application, form 8570-1; and
2. Proposed labels in pdf format (clean and highlighted versions).

If you have any questions regarding this submission, please contact me. I may be reached by phone at 770-233-4244 or by email at RichardsonLA@Koppers.com.

Sincerely,

A handwritten signature in blue ink that reads "Leigh Ann Richardson". The signature is fluid and cursive, with the first name "Leigh" being particularly prominent.

Leigh Ann Richardson
Sr. Manager Regulatory Affairs